

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DANIEL M. ROSENBAUM

No. 21 CR 239

Judge Robert M. Dow, Jr.

**UNOPPOSED MOTION FOR ENTRY OF
PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a), the United States of America, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for the entry of a protective order in this case, and in support thereof states as follows:

1. The indictment in this case charges defendant Daniel M. Rosenbaum with mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343.
2. The discovery to be provided by the government in this case includes sensitive information, the unrestricted dissemination of which could adversely affect law enforcement interests and the privacy interests of third parties.
3. The government has discussed the proposed protective order with defense counsel, who does not object to the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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Dated: April 27, 2021